

FILED
2ND JUDICIAL DISTRICT COURT
Bernalillo County
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CLERK OF THE COURT
Catherine Chavez

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT COURT

JUAN S. NUNEZ.,

Plaintiff,

vs.

No: D-202-CV-2022-01112

CHIPOTLE MEXICAN GRILL, INC., and
JOHN DOES 1-10,

Defendants.

COMPLAINT FOR NEGLIGENCE AND PERSONAL INJURIES

COMES NOW, Plaintiff Juan S. Nunez, by and through his attorney, GRAYSON LAW OFFICE, LLC (Brian G. Grayson, Esq.), and for his Complaint for Negligence and Personal Injuries, against Defendants Chipotle Mexican Grill, Inc., and John Does 1-10, state as follows:

PARTIES AND JURISDICTION

1. Plaintiff Juan Nunez is a resident of Bernalillo County, New Mexico.
2. Defendant Chipotle Mexican Grill, Inc., is a Delaware corporation that can be served through its registered agent for service of process MC-CSC1, 726 E. Michigan Dr., Ste. 101, Hobbs, NM 88240.
3. Defendants John Does 1-10 are individuals and/or corporations that may have liability to the Plaintiff for some or all of the acts complained of but whose identities are unknown at this time.
4. Jurisdiction and venue are proper in this Court as all acts complained above occurred in Bernalillo County.

EXHIBIT A

FACTUAL ALLEGATIONS

5. Plaintiff incorporates the allegations contained in Paragraphs 1 through 4 as if fully set out herein.

6. On or about August 24, 2020, Plaintiff Juan Nunez was a customer at the Chipotle Mexican Grill located at 6810 Menaul Blvd. NE Albuquerque, New Mexico 87110.

7. While he was there, Plaintiff Nunez fell on a slick floor surface and suffered personal injuries.

COUNT I – NEGLIGENCE

8. Plaintiff incorporates the allegations contained in Paragraphs 1 through 7 as if fully set out herein.

9. At all times relevant, Defendants had a duty of ordinary care for the safety of Chipotle patrons.

10. Defendants failed to exercise ordinary care and thus was negligent.

11. Defendants' negligence is a proximate cause of Plaintiff's injuries and damages.

12. As a result of Defendants' negligence, Plaintiff has suffered damages, including but not limited to personal injury damages, actual damages, together with pre-judgment interest, costs, consequential damages, and other undetermined damages, all to be proven at trial.

WHEREFORE, Plaintiff prays for judgment against Defendant for compensatory damages, actual damages, attorneys' fees and costs, pre-judgment and post-judgment interest, and for such other and further relief as the Court deems just and proper.

Respectfully Submitted,

GRAYSON LAW OFFICE, LLC

By



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